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Upon consideration of the motion of defendant GE Money Bank for the admission *pro hac vice* of Stephen M. Rummage and Jonathan M. Lloyd to this Court to appear as counsel for said defendant, and upon consideration of the declarations of James Rosenfeld, Stephen M. Rummage and Jonathan M. Lloyd in support thereof, it is hereby ORDERED that the motion is GRANTED and that Stephen M. Rummage and Jonathan M. Lloyd may enter their appearance as counsel for said defendant and actively participate in the conduct of these proceedings.

It is SO ORDERED this 4<sup>th</sup> day of May, 2005.

Joan M. Azrack, U.S.M.J.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT NEW YORK

BRUCE SCHWARTZ,

Plaintiff,

- against -

GE CAPITAL CONSUMER CARD CO. d/b/a  
GE MONEY BANK,

Defendant.

CV-06-0394 (FB) (VA)

**NOTICE OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

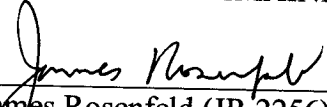
PLEASE TAKE NOTICE that, upon the affidavits and Certificates of Good Standing of movants, annexed in support of this motion, we will move this Court at the United States Courthouse for the Eastern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an order allowing the admission of Stephen M. Rummage and Jonathan M. Lloyd as attorneys *pro hac vice* to argue or try this case, in whole or in part. Mr. Rummage is a member of the law firm of Davis Wright Tremaine LLP and is a member in good standing of the Bar of the State of Washington. Mr. Lloyd is associated with Davis Wright Tremaine LLP and is a member in good standing of the Bar of the State of New York. There are no pending disciplinary proceedings against either Mr. Rummage or Mr. Lloyd in any state or federal court.

Dated: New York, New York  
April 27, 2006

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By:

  
James Rosenfeld (JR 2256)  
1633 Broadway  
New York, New York 10019  
(212) 489-8230

*Attorneys for Defendant GE Capital Consumer  
Card Co. d/b/a GE Money Bank.*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT NEW YORK

-----	X	
BRUCE SCHWARTZ,	:	
	:	CV-06-0394 (FB)
Plaintiff,	:	
	:	<b>AFFIDAVIT OF JAMES</b>
- against -	:	<b>ROSENFELD IN SUPPORT OF</b>
	:	<b>MOTION TO ADMIT COUNSEL</b>
GE CAPITAL CONSUMER CARD CO. d/b/a	:	<b><i>PRO HAC VICE</i></b>
GE MONEY BANK,	:	
	:	
Defendant.	X	
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State of New York     )  
                                  ) ss.:  
County of New York    )

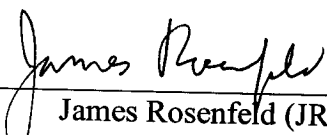
JAMES ROSENFELD, being duly sworn, hereby deposes and says as follows:

1. I am a partner in the firm of Davis Wright Tremaine, LLP, which has been engaged to appear as counsel of record for defendant GE Capital Consumer Card Co. d/b/a GE Money Bank (the “Defendant”). I submit this declaration in support of the application for the admission of Stephen M. Rummage and Jonathan M. Lloyd to appear *pro hac vice* for the Defendant.
2. I have been a member in good standing of the Bar of the State of New York since February 3, 1997 and was admitted to practice before this Court on August 12, 1997.
3. My firm has been retained by the Defendant to act as its counsel. Stephen M. Rummage is the primary attorney in this matter. He has advised and represented the Defendant on numerous matters. Jonathan M. Lloyd has assisted and will continue to assist Mr. Rummage in this matter. Both Mr. Rummage and Mr. Lloyd are highly familiar with the facts and circumstances of this case.

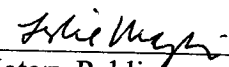
4. Mr. Rummage and Mr. Lloyd are of sufficiently good character and competence to warrant admission to appear in this Court. As set forth in Mr. Rummage's accompanying declarations, he is a member in good standing of the Bar of the State of Washington, where he was admitted to practice on October 24, 1980. He is not currently suspended or disbarred in any other court. As set forth in Mr. Lloyd's accompanying declaration, he is a member in good standing of the Bar of the State of New York, where he was admitted to practice on October 29, 2002. He is not currently suspended or disbarred in any other court.

5. In view of the qualifications, expertise and other matters stated in the declarations of Mr. Rummage and Mr. Lloyd, I believe that their admission to this Court *pro hac vice* would promote the just, speedy, efficient and fair determination of this action.

6. I have spoken to plaintiff's counsel, Brian L. Bromberg, Esq., and he does not object to the admission *pro hac vice* of Mr. Rummage and Mr. Lloyd to this Court.

  
James Rosenfeld (JR 2256)

Sworn to before me this  
27<sup>th</sup> day of April, 2006

  
Notary Public

LESLIE MAJER  
Notary Public, State of New York  
No. 4797970  
Qualified in Kings County  
Commission Expires October 31, 2009

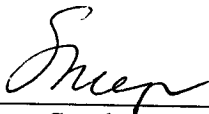
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT NEW YORK

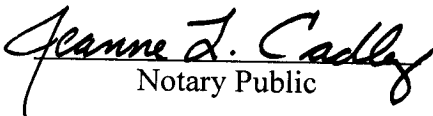
-----	X	
BRUCE SCHWARTZ,	:	
	:	CV-06-0394 (FB)
Plaintiff,	:	
	:	<b>AFFIDAVIT OF</b>
- against -	:	<b>STEPHEN M. RUMMAGE</b>
	:	<b>IN SUPPORT OF MOTION</b>
GE CAPITAL CONSUMER CARD CO. d/b/a	:	<b>TO ADMIT COUNSEL</b>
GE MONEY BANK,	:	<b>PRO HAC VICE</b>
	:	
Defendant.	X	
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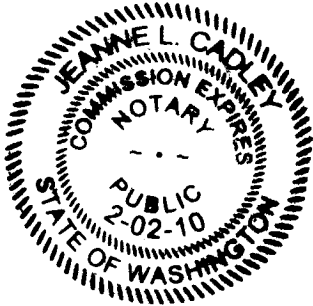
State of Washington    )  
                                  )    ss:  
County of King         )

STEPHEN M. RUMMAGE, being duly sworn, hereby deposes and says as follows:

- 1.     I am a member of the law firm of Davis Wright Tremaine LLP.
- 2.     I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
- 3.     As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the State of Washington. I was admitted to the Washington bar on October 24, 1980.
- 4.     I am not currently suspended or disbarred and there are no pending disciplinary proceedings against me in any State or Federal court.
- 5.     Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in this case.

  
\_\_\_\_\_  
Stephen M. Rummage

Sworn to before me this  
<sup>4<sup>th</sup></sup>  
26 day of April, 2006  
  
Notary Public  
SEA 1800086v1 14122-273



# STATUS CERTIFICATE

This certifies that

**STEPHEN MICHAEL RUMMAGE**

was admitted to the Bar of the State of Washington on October 24, 1980, has been an active member since admission, and has complied with all requirements of the Washington State Bar Association for payment of licensing fees and attendance at continuing legal education programs.

Dated as of April 21, 2006.



M. Janice Michels  
Executive Director

Washington State Bar Association  
2101 Fourth Avenue, Suite 400  
Seattle, WA 98121-2330  
206-443-WSBA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT NEW YORK

----- X  
BRUCE SCHWARTZ,

Plaintiff,

- against -

GE CAPITAL CONSUMER CARD CO. d/b/a  
GE MONEY BANK,

Defendant.  
----- X

CV-06-0394 (FB)

**AFFIDAVIT OF  
JONATHAN M. LLOYD  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

-----  
State of Washington    )  
                              )    ss:  
County of King         )

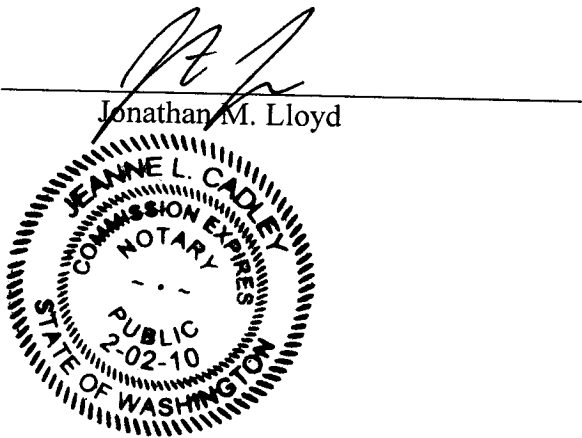
JONATHAN M. LLOYD, being duly sworn, hereby deposes and says as follows:

1. I am an associate with the law firm of Davis Wright Tremaine LLP.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of New York. I was admitted to the New York bar on October 29, 2002.
4. I am not currently suspended or disbarred and there are no pending disciplinary proceedings against me in any State or Federal court.
5. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in this case.

Sworn to before me this  
26<sup>th</sup> day of April, 2006

*Jeanne L. Cadley*  
Notary Public

SEA 1800085v1 14122-273





*State of New York*  
*Supreme Court, Appellate Division*  
*Third Judicial Department*

*I, Michael J. Novack, Clerk of the Appellate Division of the  
Supreme Court of the State of New York, Third Judicial Department, do  
hereby certify that*

*Jonathan Mark Bloyd*

*having taken and subscribed the Constitutional Oath of Office as prescribed by  
law, was duly licensed and admitted to practice by this Court as an Attorney  
and Counselor at Law in all courts of the State of New York on the 29th day  
of October, 2002, is currently in good standing and is registered with the  
Administrative Office of the Courts as required by section four hundred sixty-  
eight-a of the Judiciary Law.*

*In Witness Whereof, I have hereunto set my hand  
and affixed the Seal of said Court, at the  
City of Albany, this 20th day of April,  
2006.*



*Michael J. Novack*  
\_\_\_\_\_  
*Clerk*



**CERTIFICATE OF SERVICE**

SONIA NIEVES, states as follows:

1. The statements made herein are true of my own personal knowledge, If called upon to testify, I could and would testify competently thereto.
2. I am over 18 years of age, I reside in Bronx, New York, and am not a party to this action. I am employed by the law firm of Davis Wright Tremaine, LLP.
3. On April 27, 2006, I caused to be served via U.S. Mail, the attached **NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, AFFIDAVIT OF JAMES ROSENFELD IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, AFFIDAVIT OF STEPHEN M. RUMMAGE IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, AFFIDAVIT OF JONATHAN LLOYD IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, and CERTIFICATES OF GOOD STANDING STEPHEN M. RUMMAGE AND JONATHAN LLOYD**, addressed as follows:

Brian L. Bromberg  
Brian L. Bromberg, P.C.  
40 Exchange Place, Suite 2010  
New York, New York 10005

Harley J. Schnall  
Law Office of Harley J. Schnall  
711 West End Avenue  
New York, NY 10025

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in New York, New York on this 27<sup>th</sup> day of April, 2006.

  
SONIA NIEVES